

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

VICKI TIMPA et al.,

Plaintiffs,

JOE TIMPA,

Intervenor-Plaintiff,

V.

DUSTIN DILLARD et al.,

Defendants.

Civil Action No. 3:16-CV-3089-N

DEFENDANTS' EXHIBIT LIST

TO THE HONORABLE COURT:

Defendants, Dustin Dillard, Danny Vasquez, Raymond Dominguez, and Kevin Mansell, submit their list of trial exhibits pursuant to the Court's Fourth Amended Scheduling Order (ECF No. 225). Defendants do not contend that defense exhibits 28-43 are admissible; those exhibits would be offered only in the event that Defendants' motion to exclude the Dallas Police Department's general orders and training materials on crisis intervention are denied.

Defendants reserve the right to introduce additional exhibits as may be necessary for purposes of demonstration, impeachment, refreshing recollection, optional completeness, rebuttal, or for any other purpose permissible under the Federal Rules of Evidence.

Respectfully submitted,

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and Danny Vasquez*

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2023, I electronically filed the foregoing with the clerk of court for the U.S. District Court, Northern District of Texas, using the CM/ECF system which will notify all case participants registered for electronic notice of this filing. I further certify that to the extent applicable I have served all case participants not registered for electronic notice by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

s/ Lindsay Wilson Gowin
Senior Assistant City Attorney

EXHIBIT A**DEFENDANTS' EXHIBIT LIST**

<u>DX No.</u>	<u>Description</u>	<u>Pre-Admit</u>	<u>Offered</u>	<u>Admitted</u>
1	Merged Body-Worn Camera Video (with subtitles)			
2	Merged Body-Worn Camera Video (without subtitles)			
3	Body-Worn Camera – Vasquez (COD 4702)			
4	Body-Worn Camera – Rivera (COD 4703)			
5	Body-Worn Camera – Rivera (COD 4704)			
6	Body-Worn Camera – Dillard (COD 4705)			
7	NFA Surveillance Video Rec_002 (COD 4712)			
8	NFA Surveillance Video Rec_007 (COD 4713)			
9	911 Call – Timpa (subtitles) (COD 4729)			
10	911 Call – Timpa (no subtitles) (COD 4729)			
11	911 Call – Timpa (subtitles) (COD 4730)			
12	911 Call – Timpa (no subtitles) (COD 4730)			
13	911 Call – Female Driver (subtitles) (COD 4731)			
14	911 Call – Female Driver (no subtitles) (COD 4731)			
15	911 Call – Male Security Guard (subtitles) (COD 4732)			
16	911 Call – Male Security Guard (no subtitles) (COD 4732)			
17	Radio Traffic (COD 4733)			
18	Radio Traffic (COD 4734)			
19	Radio Traffic (COD 4735)			
20	Radio Traffic (COD 4736)			
21	Radio Traffic (COD 4737)			
22	Radio Traffic (COD 4738)			
23	Radio Traffic (COD 4739)			
24	DF-R Prehospital Care Report Summary (DEFS 000143)			
25	Autopsy Report (COD 000510-518) (redacted)			
26	DPD Incident Detail Report (DEFS 00032-38)			
27	DF-R Incident Detail Report (DEFS 000039-43)			
28	Intermediate CIT Training Slides (COD 4741-5215)			
29	Intermediate CIT - Instructor Notes (COD 7245-7339)			
30	Academy Class 345 Schedule (COD 5416-5452)			
31	Academy Class 331 Schedule (COD 5654-5690)			
32	CIT Lesson Plan 2013 (COD 5691-5743)			
33	CIT Training Handout (COD 8490-8500)			
34	Excited Delirium Lesson Plan (COD 7340-7354)			
35	Excited Delirium Training Slides (COD 8197-8202)			
36	Intermediate Use of Force Lesson Plan			

	(COD 7405-7515)			
37	Mechanics of Arrest Training (COD 6045-6054)			
38	Mental Impairment Training (COD 5800-5835)			
39	Training Record – Mansell (COD 8182-8186)			
40	Training Record – Dominguez (COD 8187-8190)			
41	Training Record – Vasquez (COD 8194-8195)			
42	Training Record – Dillard (COD 8196)			
43	DPD Linear Use-of-Force Response Continuum Chart			
44	Baylor, Scott & White Medical Records (COD 8510-8696)			
45	EnterHealth Records (COD 8697-8849)			
46	Excited Delirium Syndrome: Cause of Death and Prevention, by Theresa G. Di Maio and Vincent Di Maio (2005)			
47	Kroll MW, Brave MA, Kleist SR, Ritter MB, Ross DL, Karch SB. Applied Force During Prone Restraint: Is Officer Weight a Factor? <i>Am J Forensic Med Pathol.</i> 2019;40(1):1-7			
48	Chan TC, Neuman T, Clausen J, Eisele J, Vilke GM. Weight force during prone restraint and respiratory function. <i>Am J Forensic Med Pathol.</i> 2004;25(3):185-189			
49	Michalewicz BA, Chan TC, Vilke GM, Levy SS, Neuman TS, Kolkhorst FW. Ventilatory and metabolic demands during aggressive physical restraint in healthy adults. <i>J Forensic Sci.</i> 2007;52(1):171-175			
50	Sloane C, Chan TC, Kolkhorst F, Neuman T, Castillo EM, Vilke GM. Evaluation of the ventilatory effects of the prone maximum restraint (PMR) position on obese human subjects. <i>Forensic Sci Int.</i> 2014;237:86-89			
51	Hall CA, McHale AM, Kader AS, Stewart LC, MacCarthy CS, Fick GH. Incidence and outcome of prone positioning following police use of force in a prospective, consecutive cohort of subjects. <i>J Forensic Leg Med.</i> 2012;19(2):83-89			
52	Karch SB. The problem of police-related cardiac arrest. <i>J Forensic Leg Med.</i> 2016;41:36-41			
53	Savaser DJ, Campbell C, Castillo EM, et al. The effect of the prone maximal restraint position with and without weight force on cardiac output and other hemodynamic measures. <i>J Forensic Leg Med.</i> 2013;20(8):991-995			
54	Hall CA, Votova K, Heyd C, et al. Restraint in police use of force events: examining sudden in custody death for prone and not-prone positions. <i>J Forensic Leg Med.</i> 2015;31:29-35			
55	Photo – DSC 0002			

56	Photo – DSC 0003			
57	Photo – DSC 0034			
58	Photo – DSC 0129			
59	Photo – DSC 0138			
60	Photo – DSC 0143			
61	Photo – DSC 0152			
62	Photo – DSC 0157			
63	Photo – DSC 0164			
64	Photo – DSC 0170			
65	Photo – DSC 0172			
66	Screenshots from BWC Videos			
67	Timeline of Events on August 10, 2016			
68	DPD General Orders (Demonstrative)			
69	DPD Patrol SOPs (Demonstrative)			
70	Training Mannequin (Demonstrative)			
71	Kroll Report Table 1 (Demonstrative)			
72	Kroll Report Figure 8 (Demonstrative)			
73	Kroll Report Figure 9 (Demonstrative)			